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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 NANCY CALARCO,

12 Plaintiff,

13 vs.

14 SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC,

15 Defendant.
16

CASE NO. 2:17-cv-01682-APG-GWF

**STIPULATION AND ORDER TO EXTEND
DISCOVERY AND OTHER DEADLINES**

(FIRST REQUEST)

17 Pursuant to LR 26-4, the parties, by and through their respective counsel of record,
18 hereby stipulate and request that this Court extend discovery in the above-captioned case sixty
19 (60) days, up to and including April 30, 2018. In addition, the parties request that the
20 dispositive motions and pretrial order deadlines be extended in accordance with the discovery
21 extension as outlined herein. In support of this Stipulation and Request, the parties state as
22 follows:

- 23 1. On June 16, 2017, Plaintiff filed her Complaint (ECF No. 1).
- 24 2. On September 1, 2017, Defendant filed its Answer to the Complaint (ECF No. 13).
- 25 3. On October 10, 2017, the parties prepared and filed their Proposed Discovery Plan
26 and Scheduling Order (ECF No.16). The Court approved and entered the
27 Discovery Plan and Scheduling Order on October 11, 2017 (ECF No. 17).
- 28

1. Defendant intend to provide responses to Plaintiff's written discovery on February 20, 2018, unless additional time is required.
2. Defendant intends to take Plaintiff's deposition at the end of February or during the first week of March, 2018.
3. The parties will take the depositions of any and all other necessary witnesses as determined through discovery.

4. The parties will issue and respond to any necessary additional written discovery.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to finish necessary discovery.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

As indicated above, Plaintiff's deposition has been postponed on two occasions, initially as a result of a conflict with Plaintiff's work schedule and most recently as a result of an illness in the family of a Sunrise representative who is assisting with the defense of this matter. An additional 60 days will allow the parties to take depositions and follow up with any necessary written discovery within the time frame of the extension.

In light of these circumstances, the parties require the brief requested extension in order to complete discovery. The following is a list of the current discovery deadlines and the parties' proposed extended deadlines.

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>February 28, 2018</i>	<i>April 30, 2018</i>
Dispositive Motion	<i>March 30, 2018</i>	<i>May 29, 2018</i>
Pretrial Order	<i>April 30, 2018</i>	<i>June 29, 2018</i>

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to finish necessary discovery.

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APPROVED AS TO FORM AND CONTENT.


DATED this 7th day of February, 2018.

DATED this 7th day of February, 2018.

LEWIS BRISBOIS BISGAARD
& SMITH LLP

REMPFER MOTT LUNDY, PLLC

By



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Attorneys for Defendant

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ORDER



UNITED STATES MAGISTRATE JUDGE

DATED: February 8, 2018